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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 8, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Ex Parte Presentation
CC Docket No. 99-200
(Number Resource Optimization)**

Personal
Communications
Industry
Association

Dear Ms. Salas:

On Monday, March 6, 2000, Harold Salters, director of government relations for the Personal Communications Industry Association ("PCIA"), made a presentation to NARUC's Committee on Communications during a panel on numbering issues. At least one member of the Commission's Common Carrier Bureau, Deputy Bureau Chief Yog Varma, was present in the audience.

PCIA's presentation was entitled "Wireless Perspective on Numbering" which concerned matters addressed in the above-referenced proceeding. A copy of Mr. Salters' presentation to NARUC is attached. PCIA stated its positions, presented in its Comments and Reply Comments in this proceeding, concerning the need for a unified national framework for number conservation issues, the severe burdens imposed by individual State reporting requirements, and the need for federal codification and FCC enforcement of numbering guidelines.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter are being filed with your office. If you have any questions regarding this filing, please feel free to contact me at (703) 535-7492.

Sincerely,



Harold Salters
Director – Government Relations
Personal Communications Industry Association

cc: Yog Varma, CCB

Attachment

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**Wireless Perspective On Numbering
presented to the
National Association of Regulatory Utility Commissioners**

Winter Meeting of the Committee on
Telecommunications

March 6, 2000

Renaissance Washington Hotel, 999 Ninth Street, NW
Washington, DC

Harold Salters, Director, Government Relations

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Wireless In The Market

- **Consumer demand for wireless is growing tremendously.**
- **Provide consumers low prices, innovative services and foster competition.**
- **Numbers are the fuel for competition.**
 - **PCS + cellular + paging + ESMR**
 - **PCIA/Yankee Group:**
 - **149 million wireless subscriptions in U.S.**
 - **29% average annual growth over last 10 yrs.**

Wireless In The Market

(con't.)

- **Wireless utilizes NXX codes efficiently**

1999 CO Code Growth by Sector

CLEC	56.8%
CMRS	24.0%
ILEC	10.0%
Paging	9.2%

Wireless and the Rate Center

- **3 factors beyond wireless's control have increased need for additional NXXs:**
 - **rate center proliferation**
 - **movement to Type 2 interconnection increases need for new codes**
 - **abolition (by ILECs) of reverse billing - to provide local calling into the mobile switch, wireless carriers are forced to match rate center structure.**

Wireless and the Rate Center (Con't.)

- **Proposition: Consolidation of rate centers is the most powerful number optimization tool.**
- **California: 800 rate centers; 600 of which serve more populated areas. 1K pooling in California still means an initial 600,000 numbers for each CLEC.**

Technology Specific Overlays

- **In the absence of rate center consolidation and 10 digit dialing, TSOs would:**
 - **discriminate against wireless and wireline subscribers**
 - **reduce flexibility to handle future number demand, and**
 - **degrade number conservation efforts**

National Uniform Framework For Numbering

- **Wireless: Regional /National Configurations**
- **Uniform enforcement through NANPA/FCC**
- **No COCUS, No Numbers: FCC should mandate COCUS, including filing of Part 4.**

National Reporting Template

- **Use the hybrid COCUS and/or collect more granular information**
- **State information requests that vary in content and frequency are inefficient and counterproductive**

NANP Exhaust: Forks In The Road

- **One-third of NPAs in rationing**
- **Exhaust: An Allocation Problem; Not Just a Service Provider Problem**
- **Societal costs of exhaust are enormous**
- **10-Digit Dialing: First Critical Step to a Smooth Transition**

NANP Exhaust: Forks In The Road

(con't.)

- **Many States with overlays have had good experience transitioning to 10 digit dialing; MD (statewide) and TX.**
- **Permissive 10 digit dialing everywhere: You should not get your call blocked for doing what will be “the right thing.”**



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